Message

From: Currie, Rebecca J [rebeccacurrie@eastman.com]
Sent: 11/6/2018 4:56:56 PM
To: Roe, Lindsay [Roe.Lindsay@epa.gov]
Subject: RE: [I] RE: Chlormequat chloride dossier formatting question

Hi Lindsay,

Thank you for the prompt response and clarification. I will remove the footer on all the studies to be submitted.

Regards,

Rebecca

From: Roe, Lindsay <Roe.Lindsay@epa.gov>
Sent: Tuesday, November 06, 2018 11:51 AM
To: Currie, Rebecca J <rebeccacurrie@eastman.com>
Cc: Lewis, Marianne <Lewis.Marianne@epa.gov>; Garvie, Heather <Garvie.Heather@epa.gov>
Subject: [I] RE: Chlormequat chloride dossier formatting question

Hi, Rebecca.

The included footer is inconsistent with how data compensation is handled under FIFRA. If a study is submitted under FIFRA it will be handled in accordance with the FIFRA data compensation provisions, which do not require written permission to use the study except if it were exclusive use and then only for a certain period of time. We cannot accept the study with the footer as proposed.

Thanks,
Lindsay

From: Currie, Rebecca J [mailto:rebeccacurrie@eastman.com]
Sent: Monday, November 05, 2018 1:21 PM
To: Roe, Lindsay <Roe.Lindsay@epa.gov>
Subject: Chlormequat chloride dossier formatting question

Dear Ms. Roe,

We have recently submitted the Tolerance Import for Chlormequat Chloride and are working on preparing the registration dossier for the Section 3 submittal. I have been asked by our Counselor to add a footer to the report indicating that Eastman is the owner of the study and written consent is needed to use the study outside of the EPA. I have attached an example for your review. Can you confirm that having this footer on each page of the report would be acceptable to the EPA? We obviously do not want to cause any of the studies to be unacceptable for submission and lead to a delay in the submission and subsequent review. Thank you for your time and consideration.

Regards,

Rebecca Currie

Rebecca J. Currie, Ph.D.
Regulatory Ecotoxicologist

Product Stewardship and Regulatory Affairs
Eastman Chemical Company
Kingsport, TN 37662-5054
Office 423-229-3754
Mobile 423-440-3864